

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

---

**RE: Demeka P. Mull**

**Case No. 18-14888-JDW**

**Debtor(s)**

**Chapter: 13**

---

**RESPONSE TO NOTICE AND MOTION TO DISMISS**

---

**COME(S) NOW** the debtor(s) by and through counsel, and file(s) this Response to the Chapter 13 Trustee's "Notice and Motion to Dismiss" (Docket entry #46) and in support thereof would respectfully show unto the Honorable Court the following, to-wit:

1. That the Debtor(s) hopes to have payments caught up by the time this matter comes to be heard.

**WHEREFORE PREMISES CONSIDERED**, Debtor(s) pray that the relief requested by the Trustee be denied and for such further relief, both general and specific, to which the Debtor(s) may be entitled.

Respectfully submitted,

/s/ Kevin F. O'Brien  
KEVIN F. O'BRIEN, MSB# 10731  
O'Brien Law Firm, LLC  
1890 Goodman Road East, Suite 200  
Southaven, MS. 38671  
(662) 349-3339

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

---

**In re: Demeka P. Mull**

**Case No. 18-14888-JDW**

**Debtor(s)**

**Chapter 13**

---

**CERTIFICATE OF SERVICE**

---

The undersigned individual hereby certifies that he, on this 30<sup>th</sup>, Day of December, 2019 electronically delivered copies of the “Response to Notice and Motion to Dismiss” to all parties listed at the addresses below:

**Miss. US Trustee**

[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

**Locke Barkley**

[sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

**/s/ Kevin F. O'Brien**

**KEVIN F. O'BRIEN, MSB# 10731**

**O'Brien Law Firm, LLC**

**1890 Goodman Road East, Suite 200**

**Southaven, MS. 38671**

**(662) 349-3339**